

SHER TREMONTE LLP

March 5, 2025

VIA ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Rui-Siang Lin,*
No. 24 Crim. 178 (CM)

Dear Judge McMahon:

We represent Rui-Siang Lin, and write on behalf of our client to request a sixty-day adjournment of his sentencing hearing, which is currently scheduled for March 27, 2025, and an accompanying adjournment of the deadline for the Pre-Sentence Report (the “PSR”), which is currently due on March 7, 2025. The basis for the request is that the parties are trying to resolve certain factual disputes in advance of sentencing, including by making additional submissions to the Probation Department, and the assigned probation officer has requested until at least the end of March to consider the parties’ arguments and complete the final PSR. In addition, the defense is working diligently on its submission, but requires additional time to, among other things, obtain translations of certain documents in Chinese.

Accordingly, we respectfully request that the Court grant an adjournment of Mr. Lin’s sentencing of sixty days, or the earliest date after that period that is convenient for the Court, and an accompanying adjournment of the PSR deadline. This is Mr. Lin’s first request for an adjournment of sentencing. The government consents to this request. We appreciate the Court’s consideration.

Respectfully submitted,

/s/ Noam Biale

Noam Biale
Katie Renzler
Michael Bass

Attorneys for Rui-Siang Lin

cc: All Counsel of Record (by ECF)